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5 Attorneys for Defendant  
CRISTIAN MORA  
6

7  
8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
10

11  
12 UNITED STATES OF AMERICA, ) No. CR 12-0061-EMC-5  
13 Plaintiff, )  
14 v. ) **STIPULATION AND**  
15 CRISTIAN MORA et al, ) **[PROPOSED] ORDER FOR**  
16 Defendant. ) **RELEASE ON PREVIOUS TERMS**  
AND CONDITIONS

17  
18 Defendant Cristian Mora surrendered himself at the time  
19 of his plea pursuant to an agreement with the United States  
20 Attorney's Office that he do so. Since that time, his father, Jose  
21 Mora, who has been ill since 2007, has returned from seeking  
22 medical treatment in Mexico to see his son before Cristian begins  
23 an anticipated five year term. Mr. Jose Mora is very unwell and  
24 unable to visit his son in Glenn Dyer Jail, much less a federal  
25 prison.

26 Moreover, Cristian Mora has cooperated with the  
27 preparation of the Presentence Report. After review of the Draft  
28 Presentence Report and Bureau of Prisons Security Designation  
Program Statement (P5100.08), it has been determined that if

1 Cristian Mora were allowed to self-surrender he would, in all  
2 likelihood, be assigned to a Low Security Level instead of a Medium  
3 Security Level, which, among other benefits, would allow him many  
4 more work training and educational opportunities immediately.

5 Therefore, good cause appearing, it is hereby stipulated  
6 and agreed, by and between defendant Cristian Mora and the United  
7 States, by and through counsel, that Mr. Mora shall be released at  
8 the time of sentencing, which is scheduled to occur on July 18,  
9 2012, on the same terms and conditions of his pretrial release. He  
10 shall be allowed to self-surrender on a date determined by the  
11 Court in the Judgment and Commitment, either to the United States  
12 Marshals Service directly, or to whatever facility he is designated  
13 to.

*Defendant to Surrender Aug. 29, 2012 by 12 noon.  
Terms of pretrial release have to be in place.*

14  
15 SO STIPULATED. *el*

16 July 11, 2012

17 Date

/s/

PAUL DELANO WOLF  
Attorney for Defendant  
CRISTIAN MORA

18  
19 SO STIPULATED.

20  
21 July 11, 2012

22 Date

/s/

KEVIN BARRY  
Assistant United States Attorney

23  
24 SO ORDERED.

25 7/18/12

26 Date

  
HONORABLE EDWARD M. CHEN  
United States District Judge